

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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JINGYU CHEN,

Plaintiff,

-against-

YONG ZHAO CAI, QIAN Y. CAI,  
JIANG LI, KIM K. CHEUNG,  
THE EASTERN US BUDDHA'S STUDY  
(FALUN DAFA) ASSOCIATION, INC.,  
FRIENDS OF FALUN GONG, INC.,  
INTERNATIONAL FALUN DAFA ASSOCIATION,  
INC., NEW YORK FALUN DAFA ASSOCIATION  
CORP., NY METROPOLITAN FALUN DAFA  
ASSOCIATION, INC.,

**CIVIL ACTION COMPLAINT  
TRIAL BY JURY DEMANDED**

**Civil Action #:** \_\_\_\_\_

Defendants.

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**COMPLAINT AGAINST SLAVERY AND HUMAN TRAFFICKING  
IN VIOLATION OF THE 13<sup>TH</sup> AMENDMENT OF THE CONSTITUTION  
OF THE UNITED STATES AND FEDERAL LAW ENACTED FOR THE  
ENFORCEMENT OF THE SAME**

The plaintiff, Jingyu Chen, by and through assistance of counsel the Mount Law Group, PLLC, sues the defendants Yong Zhao Cai, Qian Y. Cai, Jiang Li, Kim K. Cheung, The Eastern US Buddha's Study (Falun Dafa) Association, Inc., Friends of Falun Gong, Inc., International Falun Dafa Association, Inc., New York Falun Dafa Association Corp., and NY Metropolitan Falun Dafa Association, Inc. for the enslaving and trafficking of herself in violation of 18 U.S.C. §§ 1581 1583, 1584 1589, 1590, 1592, 1593 and 1595 and other related causes of action at common law. As grounds for the same, Ms. Chen alleges as follows:

## **Jurisdiction & Venue**

1. This civil action is for violations of 18 U.S.C. §§ 1581 1583, 1584 1589, 1590, 1592, 1593 and 1595 and other related causes of action at common law. 18 U.S.C. § 1581 *et seq.* was enacted by Congress for the enforcement of prohibitions against slavery provided by the 13<sup>th</sup> Amendment of the U.S. Constitution.
2. This Court has subject matter jurisdiction and venue is proper in general pursuant to 28 U.S.C. § 1331, as this case is brought to enforce federal law and thus federal questions of law are at stake.
3. This Court has subject matter jurisdiction and venue is proper specifically pursuant to 18 U.S.C. §§ 1595 (a) & 1596 (a)(1)-(2).
4. This Court has personal jurisdiction over the parties to this case as all parties reside and have their headquarters within New York State counties under the jurisdiction of the Southern District of New York.
5. Lastly, this Court has jurisdiction and venue is proper to hear this case as many if not most of the instances complained of herein, based upon information and belief, took place in Orange and New York Counties in the State of New York.

## **Parties**

6. Jingyu Chen (hereinafter referred to as “Ms. Chen”) is a natural person residing in the State of New York.
7. Ms. Chen seeks compensation for her injuries that are, and result from, her enslavement and trafficking at the hands of the defendants from May of 2016 until January of 2018.

8. Yong Zhao Cai is a natural person, who based upon information and belief resided in Orange County New York at the times the instances herein complained of took place.
9. Yong Zhao Cai was and is a subscriber, adherent, believer and follower of the religion and religious organization known as “Falun Gong” or “Falun Dafa” and the Falun Dafa religion.
10. Qian Y. Cai is a natural person, who based upon information and belief resided in both Orange County New York at the times the instances herein complained of took place, however, now currently resides in Richmond County New York.
11. Qian Y. Cai was and is a subscriber, adherent, believer and follower of the religion and religious organization known as “Falun Gong” or “Falun Dafa” and the Falun Dafa religion.
12. Jiang Li is a natural person, who based upon information and belief resided in the State of New York at the times the instances herein complained of took place.
13. Jiang Li was and is a subscriber, adherent, believer and follower of the religion and religious organization known as “Falun Gong” or “Falun Dafa” and the Falun Dafa religion.
14. Kim K. Cheung is a natural person, who based upon information and belief resided in Queens County New York at the times the instances herein complained of took place.
15. Kim K. Cheung was and is an agent, employee and/or organizer for the Falun Dafa religion and defendants; The Eastern US Buddha’s Study (Falun Dafa) Association, Inc., International Falun Dafa Association, Inc., New York Falun Dafa Association Corp., and NY Metropolitan Falun Dafa Association, Inc., and was and is a subscriber, adherent,

believer and follower of the religion and religious organization known as “Falun Gong” or “Falun Dafa” and the Falun Dafa religion.

16. Defendants The Eastern US Buddha’s Study (Falun Dafa) Association, Inc., Friends of Falun Gong, Inc., International Falun Dafa Association, Inc., New York Falun Dafa Association Corp., and NY Metropolitan Falun Dafa Association, Inc., are, based upon available information and current belief, corporate entities registered and headquartered in the State of New York that comprise and legally establish the religion and religious organization known as “Falun Gong” and/or “Falun Dafa.”
17. Defendant The Eastern US Buddha’s Study (Falun Dafa) Association, Inc., based upon available information and current belief, is headquartered at 103 Eagan Avenue, Staten Island, New York 10312.
18. Defendant Friends of Falun Gong, Inc., based upon availability information and current belief, is headquartered at 225 East 85<sup>th</sup> Street, New York, New York 10028.
19. Defendant International Falun Dafa Association, Inc., based upon available information and current belief, is headquartered in Cuddebackville, New York 12729.
20. Defendant New York Falun Dafa Association Corp., based upon available information and current belief, is headquartered at 18 Wedgewood Lane, Middletown, New York 10940.
21. Defendant NY Metropolitan Falun Dafa Association, Inc., based upon available information and current belief, is headquartered at 99-05 59<sup>th</sup> Avenue, Suite 5E, Corona, New York 11368.
22. Based upon available information and belief, defendants The Eastern US Buddha’s Study (Falun Dafa) Association, Inc., Friends of Falun Gong, Inc., International Falun Dafa

Association, Inc., New York Falun Dafa Association Corp., and NY Metropolitan Falun Dafa Association, Inc., have oral and written agreements, religious and/or commercial in nature, binding each to each other for the purposes of mutual political, commercial and religious objectives and cooperate and operate together as a cohesive whole.

23. Defendants the Eastern US Buddha's Study (Falun Dafa) Association, Inc., Friends of Falun Gong, Inc., International Falun Dafa Association, Inc., New York Falun Dafa Association Corp., and NY Metropolitan Falun Dafa Association, Inc. shall be referred to collectively throughout as the "Falun Dafa religion."

**Facts Germaine to all Causes of Action**

24. Ms. Chen was intentionally enticed into a state of slavery and held in the same by use of sexual violence, other physical violence, as well as threats to herself and her family from May 27, 2016 until her escape in January of 2018.

**First Cause of Action – Private Right of Action pursuant to 18 U.S.C. § 1595**

**For Enticement into Slavery pursuant to 18 U.S.C. § 1583**

**Against Defendant Yong Zhao Cai**

25. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

26. Ms. Chen was introduced to Yong Zhao Cai in November of 2015 via a mutual acquaintance where Ms. Chen was attending a University in China.

27. Communication between Ms. Chen and Yong Zhao Cai began via text messaging and phone calls in November of 2015.

28. It was clear to Ms. Chen that Yong Zhao Cai was interested in pursuing an intimate relationship.

29. On December 12, 2015, Ms. Chen and Yong Zhao Cai met in person for the first time.
30. At the December 12, 2015 meeting Yong Zhao Cai stated that he loved Ms. Chen and impressed upon her that he would be totally committed and devoted to her.
31. Following the December 12, 2015 meeting, Yong Zhao Cai continued to affirm his commitment and “devotion” to Ms. Chen via regular meetings, as well as over text and via phone calls on a daily basis.
32. Ms. Chen believed that she was in a committed relationship with Yong Zhao Cai.
33. In early 2016 Yong Zhao Cai requested that Ms. Chen accompany him to the United States to visit family.
34. Little did Ms. Chen know at that time, Yong Zhao Cai intended all along to bring Ms. Chen to the United States to serve as a slave in his home in Orange County, New York.
35. Pursuant to Yong Zhao Cai’s repeated requests, Ms. Chen obtained a visa to travel to the United States in early 2016.
36. Pursuant to Yong Zhao Cai’s request, Ms. Chen boarded a flight to the United States on May 27, 2016.
37. Ms. Chen believed she would be returning to China after a short stay in the United States, to visit Yong Zhai Cai’s family, as she had an exam at her University back in China on July 12, 2016.
38. Upon arrival in the United States, Ms. Chen was transported by Yong Zhao Cai from the airport to his home located at 189 Guymard Turnpike, Middletown, New York 10940 (referred to as “home” hereinafter).

39. Upon Ms. Chen's arrival at Yong Zhao Cai's home, it became immediately clear that she was in a state of slavery as she was expected to be a nanny for Yong Zhao Cai's children, a housekeeper, and as Yong Zhao Cai's personal sex slave.

40. She was not permitted to leave or travel anywhere without Yong Zhao Cai's permission and control. She was not allowed to return to China.

41. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

42. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

43. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Second Cause of Action – Private Right of Action pursuant to 18 U.S.C. § 1595**

**For Trafficking with respect to peonage, slavery, involuntary servitude**

**or forced labor pursuant to 18 U.S.C. § 1590**

**Against Defendant Yong Zhao Cai**

44. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

45. Ms. Chen was recruited in China and transported from China and the airport in New York to Yong Zhao Cai's home in Middletown New York.

46. Upon arrival at Yong Zhao Cai's home in Middletown New York, Ms. Chen was expected to work at the home as well as engage in on-demand sexual activities for Yong Zhao Cai as described in all the succeeding paragraphs.

47. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

48. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

49. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Third Cause of Action – Private Right of Action pursuant to 18 U.S.C. § 1595**

**For Peonage pursuant to 18 U.S.C. § 1581**

**& Forced Labor pursuant to 18 U.S.C. § 1589(a) against Defendant Yong Zhao Cai**

50. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

51. Upon Ms. Chen's arrival at Yong Zhao Cai's home in Middletown New York, on or about May 27, 2016, she was immediately pressed into a state of slavery.

52. Ms. Chen's responsibilities to Yong Zhao Cai included, but were not limited to; sexual intercourse on demand, video recorded sexual acts, cleaning the interior of the home, yard work, babysitting, food shopping, cooking, and other activities.

53. Yong Zhao Cai used intentional extreme acts of violence, threats, and coercion to obtain, control and enslave Ms. Chen, which included but were not limited to; violate rape, choking, punching and kicking, withholding food and water, confiscation of immigration and identification documents, the threat that if Ms. Chen did not obey she would be reported to U.S. government authorities who in turn would kill her for being in the U.S. undocumented, and the threat that someone hired by Yong Zhao Cai would kill her parents back in China.

54. Yong Zhao Cai knowingly benefited from the violent enslavement of Ms. Chen in the following ways; sexual gratification on demand, cooked meals, babysitting services, grocery shopping, and the cleanliness and maintenance of both the interior and exterior of his home in Middletown New York.

55. The conduct described in the above paragraphs occurred on a continuous basis from May 27, 2016 until January 2018.

56. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

57. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

58. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Fourth Cause of Action – Private Right of Action pursuant to 18 U.S.C. § 1595**

**For Unlawful conduct with respect to documents in furtherance of  
Trafficking, peonage, slavery, involuntary servitude and forced labor  
pursuant to 18 U.S.C. § 1599 Against Defendant Yong Zhao Cai**

59. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

60. Ms. Chen was recruited in China and transported from China and the airport in New York to Yong Zhao Cai's home in Middletown New York.

61. Upon arrival at Yong Zhao Cai's home in Middletown New York, Ms. Chen was expected to work at the home as well as engage in on-demand sexual activities for Yong Zhao Cai as described in all the preceding and succeeding paragraphs.

62. In addition to violate rape, beatings, threats of further bodily injury, threats of death, and threats of death of family members, Yong Zhao Cai also knowingly confiscated Ms. Chen's passport as well as all other identifying documentation.

63. Yong Zhao Cai's knowing confiscation of Ms. Chen's passport and identifying documentation was done to further prevent Ms. Chen's escape and restrict her movement.

64. Yong Zhao Cai stated on multiple occasions, and convinced Ms. Chen, that if she were caught by any government agency without her passport or any identifying documents, she would be arrested and killed.

65. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

66. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

67. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Fifth Cause of Action – Private Right of Action pursuant to 18 U.S.C. § 1595**

**For Peonage pursuant to 18 U.S.C. § 1581**

**& Forced Labor pursuant to 18 U.S.C. § 1589(a) against Defendant Qian Y. Cai**

68. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

69. Qian Y. Cai is Yong Zhao Cai's biological sister.

70. Upon Ms. Chen's arrival at Yong Zhao Cai's home, Qian Y. Cai intentionally contributed to Ms. Chen's violent enslavement.

71. Qian Y. Cai frequented Yong Zhao Cai's home in Middletown New York very often and would stay for various periods of time.
72. Qian Y. Cai forced Ms. Chen to perform house cleaning and maintenance chores regularly as well as food shopping.
73. Qian Y. Cai would threaten to tell Yong Zhao Cai if Ms. Chen failed to perform any of her assigned chores and Ms. Chen feared for her life as a result.
74. Qian Y. Cai also threatened to turn Ms. Chen over to U.S. government authorities or abandon her at different locations without any money or means to return to the home in Middletown NY.
75. Qian Y. Cai knowingly benefited from the violent enslavement of Ms. Chen in the following ways; cooked meals, babysitting services, grocery shopping, and the cleanliness and maintenance of both the interior and exterior of her brother's home in Middletown New York.
76. The conduct described in the above paragraphs occurred on a continuous basis from May 27, 2016 until January 2018.
77. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.
78. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.
79. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Sixth Cause of Action – Private Right of Action pursuant to 18 U.S.C. § 1595**

**For Peonage pursuant to 18 U.S.C. § 1581**

**& Forced Labor pursuant to 18 U.S.C. § 1589(a) against Defendant Jiang Li**

80. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.
81. Jiang Li is a close friend and colleague of Yong Zhao Cai.
82. Upon Ms. Chen's arrival at Yong Zhao Cai's home, Jiang Li intentionally contributed to Ms. Chen's violent enslavement.
83. Jiang Li frequented Yong Zhao Cai's home in Middletown New York very often and would stay for various periods of time.
84. Jiang Li forced Ms. Chen to perform house cleaning and maintenance chores regularly.
85. Jiang Li also actively worked to intimidate Ms. Chen and prevent her escape.
86. Jiang Li would threaten the use of sexual and other physical violence against Ms. Chen or threaten to tell Yong Zhao Cai if Ms. Chen failed to perform any of her assigned chores and Ms. Chen feared for her life as a result.
87. Jiang Li, in one particular instance, used violence in the form of a physical beating on November 1, 2016 in order to prevent Ms. Chen's escape from Yong Zhao Cai's home.
88. Jiang Li knowingly benefited from the violent enslavement of Ms. Chen in the following ways; cooked meals, grocery shopping, and the cleanliness and maintenance of both the interior and exterior of his friend's home in Middletown New York.
89. The conduct described in the above paragraphs occurred on a continuous basis from May 27, 2016 until January 2018.
90. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

91. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

92. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Seventh Cause of Action – Private Right of Action pursuant to 18 U.S.C. § 1595**

**For Peonage pursuant to 18 U.S.C. § 1581**

**& Forced Labor pursuant to 18 U.S.C. § 1589(a) against Defendant Kim K. Cheung**

93. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

94. Kim K. Cheung is a close friend and colleague of Yong Zhao Cai.

95. Kim K. Cheung is an organizer for the Falun Dafa religion.

96. Upon Ms. Chen's arrival at Yong Zhao Cai's home, Kim K. Cheung intentionally contributed to Ms. Chen's violent enslavement.

97. Kim K. Cheung frequented Yong Zhao Cai's home in Middletown New York very often and would stay for various periods of time.

98. Kim K. Cheung forced Ms. Chen to perform house cleaning and maintenance chores regularly.

99. Kim K. Cheung also actively worked to intimidate Ms. Chen and prevent her escape.

100. Kim K. Cheung would threaten the use of sexual and other physical violence against Ms. Chen or threaten to tell Yong Zhao Cai if Ms. Chen failed to perform any of her assigned chores and Ms. Chen feared for her life as a result.

101. Kim K. Cheung, sexually assaulted Ms. Chen in November of 2016 at Yong Zhao Cai's home for his own personal pleasure and gratification.

102. Kim K. Cheung also used the threat of force and sexual violence to intimidate Ms. Chen to sign documents that Kim K. Cheung would later use to file a fraudulent asylum application on Ms. Chen's behalf in November of 2016.

103. Kim K. Cheung, acting as an organizer and leader for the Falun Dafa religion, forced Ms. Chen on multiple occasions to attend and participate in Falun Dafa protests, festivals and events from May of 2016 until January of 2018.

104. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photographed at said protest. The photographs from this protest were uploaded to the internet.

105. Kim K. Cheung knowingly benefited from the violent enslavement of Ms. Chen in the following ways; service to the Falun Dafa religion by forcing Ms. Chen's participation in the same, sexual gratification, cooked meals, grocery shopping, and the cleanliness and maintenance of both the interior and exterior of his friend's home in Middletown New York.

106. The conduct described in the above paragraphs occurred on a continuous basis from May 27, 2016 until January 2018.

107. Due to Ms. Chen's being forced to file an asylum application as well as her involvement with the Falun Dafa religion, Ms. Chen will not be able to return to China as these activities are considered treasonous by the Chinese Government.

108. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

109. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

110. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Eighth Cause of Action – Private Right of Action pursuant to 18 U.S.C. § 1595**

**For Peonage pursuant to 18 U.S.C. § 1581**

**& Forced Labor pursuant to 18 U.S.C. § 1589(a) against the Defendant**

**The Eastern US Buddha's Study (Falun Dafa) Association, Inc.**

**via the Doctrine of Respondeat Superior**

111. Plaintiff repeats each and every allegation from the first paragraph as if the same were set forth herein at length.

112. Between May of 2016 and January of 2018, the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion employed Kim K. Cheung as an organizer for various activities.

113. Based upon information and belief, the Eastern US Buddha's Study (Falun Dafa) Association, Inc., still employs Kim K. Cheung as an organizer for various activities.

114. During Kim K. Cheung's employment with the Eastern US Buddha's Study (Falun Dafa) Association, Inc., Kim K. Cheung forced Ms. Chen, via threats of physical and sexual violence, to attend and participate in multiple political protests as well as religious festivals hosted by and for the benefit of the Eastern US Buddha's Study (Falun Dafa) Association, Inc., the Falun Dafa religion from May of 2016 until January of 2018.

115. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photographed at said protest. The photographs from this protest were uploaded to the internet.

116. Kim K. Cheung's conduct in forcing Ms. Chen to attend and participate in said protests and festivals was for the benefit of the Eastern US Buddha's Study (Falun Dafa) Association, Inc., the Falun Dafa religion.

117. The Eastern US Buddha's Study (Falun Dafa) Association, Inc. and the Falun Dafa religion benefited from Ms. Chen's forced attendance in that she was represented to the public as a supporter and follower of the same, bolstering the Eastern US Buddha's Study (Falun Dafa) Association, Inc., the Falun Dafa religion's public appearance and reputation as being a legitimate religion.

118. Kim K. Cheung's intentional employment of Ms. Chen in various protests and festivals for the benefit of Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion was within the scope of his duties as an organizer for the same and reasonably foreseeable.

119. Based upon information and belief, the role of an organizer within the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion includes, but is not limited to, recruiting and organizing people for various events for the benefit of the same including protests and festivals.

120. Due to Ms. Chen's involvement with the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion, Ms. Chen will not be able to return to China as these activities are considered treasonous by the Chinese Government.

121. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

122. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

123. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Ninth Cause of Action – Private Right of Action pursuant to 18 U.S.C. § 1595**

**For Peonage pursuant to 18 U.S.C. § 1581**

**& Forced Labor pursuant to 18 U.S.C. § 1589(a) against the Defendant**

**Friends of Falun Gong, Inc. via the Doctrine of Respondeat Superior**

124. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

125. Between May of 2016 and January of 2018, the Friends of Falun Gong, Inc., and the Falun Dafa religion employed Kim K. Cheung as an organizer for various activities.

126. Based upon information and belief, the Friends of Falun Gong, Inc., still employs Kim K. Cheung as an organizer for various activities.

127. During Kim K. Cheung's employment with the Friends of Falun Gong, Inc., Kim K. Cheung forced Ms. Chen, via threats of physical and sexual violence, to attend and participate in multiple political protests as well as religious festivals hosted by and for the benefit of the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion from May of 2016 until January of 2018.

128. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photograph at said protest. The photographs from this protest were uploaded to the internet.

129. Kim K. Cheung's conduct in forcing Ms. Chen to attend and participate in said protests and festivals was for the benefit of the Friends of Falun Gong, Inc., and the Falun Dafa religion.

130. The Friends of Falun Gong, Inc. and the Falun Dafa religion benefited from Ms. Chen's forced attendance in that she was represented to the public as a supporter and follower of the same, bolstering the Friends of Falun Gong, Inc., and the Falun Dafa religion's public appearance and reputation as being a legitimate religion.

131. Kim K. Cheung's intentional employment of Ms. Chen in various protests and festivals for the benefit of the Friends of Falun Gong, Inc., and the Falun Dafa religion was within the scope of his duties as an organizer for the same and reasonably foreseeable.

132. Based upon information and belief, the role of an organizer within the Friends of Falun Gong, Inc., and the Falun Dafa religion includes, but is not limited to, recruiting and organizing people for various events for the benefit of the same including protests and festivals.

133. Due to Ms. Chen's involvement with the Friends of Falun Gong, Inc., and the Falun Dafa religion, Ms. Chen will not be able to return to China as these activities are considered treasonous by the Chinese Government.

134. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

135. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

136. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Tenth Cause of Action – Private Right of Action pursuant to 18 U.S.C. § 1595**

**For Peonage pursuant to 18 U.S.C. § 1581**

**& Forced Labor pursuant to 18 U.S.C. § 1589(a) against the  
Defendant International Falun Dafa Association, Inc.,  
via the Doctrine of Respondeat Superior**

137. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

138. Between May of 2016 and January of 2018, the International Falun Dafa Association, Inc., and the Falun Dafa religion employed Kim K. Cheung as an organizer for various activities.

139. Based upon information and belief, the the International Falun Dafa Association, Inc. and the Falun Dafa religion still employ Kim K. Cheung as an organizer for various activities.

140. During Kim K. Cheung's employment with the International Falun Dafa Association, Inc. and the Falun Dafa religion, Kim K. Cheung forced Ms. Chen, via threats of physical and sexual violence, to attend and participate in multiple political protests as well as religious festivals hosted by and for the benefit of the International Falun Dafa Association, Inc., and the Falun Dafa religion from May of 2016 until January of 2018.

141. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photograph at said protest. The photographs from this protest were uploaded to the internet.

142. Kim K. Cheung's conduct in forcing Ms. Chen to attend and participate in said protests and festivals was for the benefit of the International Falun Dafa Association, Inc. and the Falun Dafa religion.

143. The International Falun Dafa Association, Inc. and the Falun Dafa religion benefited from Ms. Chen's forced attendance in that she was represented to the public as a supporter and follower of the same, bolstering the International Falun Dafa Association, Inc. and the Falun Dafa religion's public appearance and reputation as being a legitimate religion.

144. Kim K. Cheung's intentional employment of Ms. Chen in various protests and festivals for the benefit of the International Falun Dafa Association, Inc. and the Falun Dafa religion was within the scope of his duties as an organizer for the same and reasonably foreseeable.

145. Based upon information and belief, the role of an organizer within the International Falun Dafa Association, Inc. and the Falun Dafa religion includes, but is not limited to, recruiting and organizing people for various events for the benefit of the same including protests and festivals.

146. Due to Ms. Chen's involvement with the International Falun Dafa Association, Inc., and the Falun Dafa religion, Ms. Chen will not be able to return to China as these activities are considered treasonous by the Chinese Government.

147. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

148. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

149. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Eleventh Cause of Action – Private Right of Action pursuant to 18 U.S.C. § 1595**

**For Peonage pursuant to 18 U.S.C. § 1581**  
**& Forced Labor pursuant to 18 U.S.C. § 1589(a) against the**  
**Defendant New York Falun Dafa Association Corp**  
**via the Doctrine of Respondeat Superior**

150. Plaintiff repeats each and every allegation from the first paragraph as if the same were set forth herein at length.

151. Between May of 2016 and January of 2018, the New York Falun Dafa Association Corp, and the Falun Dafa religion employed Kim K. Cheung as an organizer for various activities.

152. Based upon information and belief, the New York Falun Dafa Association Corp and the Falun Dafa religion still employ Kim K. Cheung as an organizer for various activities.

153. During Kim K. Cheung's employment with the New York Falun Dafa Association Corp and the Falun Dafa religion, Kim K. Cheung forced Ms. Chen, via threats of physical and sexual violence, to attend and participate in multiple political protests as well as religious festivals hosted by and for the benefit of the New York Falun Dafa Association Corp and the Falun Dafa religion from May of 2016 until January of 2018.

154. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photographed at said protest. The photographs from this protest were uploaded to the internet.

155. Kim K. Cheung's conduct in forcing Ms. Chen to attend and participate in said protests and festivals was for the benefit of New York Falun Dafa Association Corp and the Falun Dafa religion.

156. The New York Falun Dafa Association Corp and the Falun Dafa religion benefited from Ms. Chen's forced attendance in that she was represented to the public as a supporter and follower of the same, bolstering the New York Falun Dafa Association Corp and the Falun Dafa religion's public appearance and reputation as being a legitimate religion.

157. Kim K. Cheung's intentional employment of Ms. Chen in various protests and festivals for the benefit of the New York Falun Dafa Association Corp and the Falun Dafa religion was within the scope of his duties as an organizer for the same and reasonably foreseeable.

158. Based upon information and belief, the role of an organizer within the New York Falun Dafa Association Corp and the Falun Dafa religion includes, but is not limited to, recruiting and organizing people for various events for the benefit of the same including protests and festivals.

159. Due to Ms. Chen's involvement with the New York Falun Dafa Association Corp and the Falun Dafa religion, Ms. Chen will not be able to return to China as these activities are considered treasonous by the Chinese Government.

160. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

161. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

162. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Twelfth Cause of Action – Private Right of Action pursuant to 18 U.S.C. § 1595**

**For Peonage pursuant to 18 U.S.C. § 1581**  
**& Forced Labor pursuant to 18 U.S.C. § 1589(a) against the**  
**Defendant NY Metropolitan Falun Dafa Association, Inc.,**  
**via the Doctrine of Respondeat Superior**

163. Plaintiff repeats each and every allegation from the first paragraph as if the same were set forth herein at length.
164. Between May of 2016 and January of 2018, the NY Metropolitan Falun Dafa Association, Inc. and the Falun Dafa religion employed Kim K. Cheung as an organizer for various activities.
165. Based upon information and belief, the NY Metropolitan Falun Dafa Association, Inc. and the Falun Dafa religion still employ Kim K. Cheung as an organizer for various activities.
166. During Kim K. Cheung's employment with the NY Metropolitan Falun Dafa Association, Inc. and the Falun Dafa religion, Kim K. Cheung forced Ms. Chen, via threats of physical and sexual violence, to attend and participate in multiple political protests as well as religious festivals hosted by and for the benefit of the NY Metropolitan Falun Dafa Association, Inc. and the Falun Dafa religion from May of 2016 until January of 2018.
167. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photographed at said protest. The photographs from this protest were uploaded to the internet.

168. Kim K. Cheung's conduct in forcing Ms. Chen to attend and participate in said protests and festivals was for the benefit of NY Metropolitan Falun Dafa Association, Inc. and the Falun Dafa religion.

169. The NY Metropolitan Falun Dafa Association, Inc. and the Falun Dafa religion benefited from Ms. Chen's forced attendance in that she was represented to the public as a supporter and follower of the same, bolstering the NY Metropolitan Falun Dafa Association, Inc. and the Falun Dafa religion's public appearance and reputation as being a legitimate religion.

170. Kim K. Cheung's intentional employment of Ms. Chen in various protests and festivals for the benefit of the NY Metropolitan Falun Dafa Association, Inc. and the Falun Dafa religion was within the scope of his duties as an organizer for the same and reasonably foreseeable.

171. Based upon information and belief, the role of an organizer within the NY Metropolitan Falun Dafa Association, Inc. and the Falun Dafa religion includes, but is not limited to, recruiting and organizing people for various events for the benefit of the same including protests and festivals.

172. Due to Ms. Chen's involvement with the NY Metropolitan Falun Dafa Association, Inc. and the Falun Dafa religion, Ms. Chen will not be able to return to China as these activities are considered treasonous by the Chinese Government.

173. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

174. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

175. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Thirteenth Cause of Action – Private Right of Action pursuant to 18 U.S.C. § 1595**

**For Peonage pursuant to 18 U.S.C. § 1581**

**& Forced Labor pursuant to 18 U.S.C. § 1589(b) against the Defendant**

**The Eastern US Buddha's Study (Falun Dafa) Association, Inc.**

176. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

177. Between May of 2016 and January of 2018, the Eastern US Buddha's Study (Falun Dafa) Association, Inc. and the Falun Dafa religion employed Kim K. Cheung as an organizer for various activities.

178. Based upon information and belief, the Eastern US Buddha's Study (Falun Dafa) Association, Inc. and the Falun Dafa religion still employ Kim K. Cheung as an organizer for various activities.

179. During Kim K. Cheung's employment with the Eastern US Buddha's Study (Falun Dafa) Association, Inc. and the Falun Dafa religion, Kim K. Cheung forced Ms. Chen, via threats of physical and sexual violence, to attend and participate in multiple political protests as well as religious festivals hosted by and for the benefit of the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion from May of 2016 until January of 2018.

180. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photograph at said protest. The photographs from this protest were uploaded to the internet.

181. Kim K. Cheung's conduct in forcing Ms. Chen to attend and participate in said protests and festivals was for the benefit of the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion.

182. The Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion knowingly and/or recklessly benefited from the venture of Ms. Chen's enslavement and forced attendance in that she was represented to the public as a supporter and follower of the same, bolstering the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion's public appearance and reputation as being a legitimate religion.

183. Due to Ms. Chen's involvement with the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion, Ms. Chen will not be able to return to China as these activities are considered treasonous by the Chinese Government.

184. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

185. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

186. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Fourteenth Cause of Action – Private Right of Action pursuant to 18 U.S.C. § 1595**

**For Peonage pursuant to 18 U.S.C. § 1581**

**& Forced Labor pursuant to 18 U.S.C. § 1589(b) against the Defendant**

**The Friends of Falun Gong, Inc.**

187. Plaintiff repeats each and every allegation from the first paragraph as if the same were set forth herein at length.

188. Between May of 2016 and January of 2018, the Friends of Falun Gong, Inc. and the Falun Dafa religion employed Kim K. Cheung as an organizer for various activities.

189. Based upon information and belief, the Friends of Falun Gong, Inc. and the Falun Dafa religion still employ Kim K. Cheung as an organizer for various activities.

190. During Kim K. Cheung's employment with the Friends of Falun Gong, Inc. and the Falun Dafa religion, Kim K. Cheung forced Ms. Chen, via threats of physical and sexual violence, to attend and participate in multiple political protests as well as religious festivals hosted by and for the benefit of the Friends of Falun Gong, Inc., and the Falun Dafa religion from May of 2016 until January of 2018.

191. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photographed at said protest. The photographs from this protest were uploaded to the internet.

192. Kim K. Cheung's conduct in forcing Ms. Chen to attend and participate in said protests and festivals was for the benefit of the Friends of Falun Gong, Inc., and the Falun Dafa religion.

193. The Friends of Falun Gong, Inc., and the Falun Dafa religion knowingly and/or recklessly benefited from the venture of Ms. Chen's enslavement and forced attendance in that she was represented to the public as a supporter and follower of the same, bolstering the Friends of Falun Gong, Inc., and the Falun Dafa religion's public appearance and reputation as being a legitimate religion.

194. Due to Ms. Chen's involvement with the Friends of Falun Gong, Inc., and the Falun Dafa religion, Ms. Chen will not be able to return to China as these activities are considered treasonous by the Chinese Government.

195. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

196. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

197. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Fifteenth Cause of Action – Private Right of Action pursuant to 18 U.S.C. § 1595**

**For Peonage pursuant to 18 U.S.C. § 1581**

**& Forced Labor pursuant to 18 U.S.C. § 1589(b) against the  
Defendant International Falun Dafa Association, Inc.**

198. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

199. Between May of 2016 and January of 2018, the International Falun Dafa Association, Inc. and the Falun Dafa religion employed Kim K. Cheung as an organizer for various activities.

200. Based upon information and belief, the International Falun Dafa Association, Inc. and the Falun Dafa religion still employ Kim K. Cheung as an organizer for various activities.

201. During Kim K. Cheung's employment with the International Falun Dafa Association, Inc. and the Falun Dafa religion, Kim K. Cheung forced Ms. Chen, via

threats of physical and sexual violence, to attend and participate in multiple political protests as well as religious festivals hosted by and for the benefit of the International Falun Dafa Association, Inc., and the Falun Dafa religion from May of 2016 until January of 2018.

202. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photograph at said protest. The photographs from this protest were uploaded to the internet.

203. Kim K. Cheung's conduct in forcing Ms. Chen to attend and participate in said protests and festivals was for the benefit of the International Falun Dafa Association, Inc., and the Falun Dafa religion.

204. The International Falun Dafa Association, Inc., and the Falun Dafa religion knowingly and/or recklessly benefited from the venture of Ms. Chen's enslavement and forced attendance in that she was represented to the public as a supporter and follower of the same, bolstering the International Falun Dafa Association, Inc., and the Falun Dafa religion's public appearance and reputation as being a legitimate religion.

205. Due to Ms. Chen's involvement with the International Falun Dafa Association, Inc., and the Falun Dafa religion, Ms. Chen will not be able to return to China as these activities are considered treasonous by the Chinese Government.

206. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

207. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

208. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Sixteenth Cause of Action – Private Right of Action pursuant to 18 U.S.C. § 1595**

**For Peonage pursuant to 18 U.S.C. § 1581**

**& Forced Labor pursuant to 18 U.S.C. § 1589(b) against the**

**Defendant New York Falun Dafa Association Corp**

209. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

210. Between May of 2016 and January of 2018, the New York Falun Dafa Association Corp and the Falun Dafa religion employed Kim K. Cheung as an organizer for various activities.

211. Based upon information and belief, the New York Falun Dafa Association Corp and the Falun Dafa religion still employ Kim K. Cheung as an organizer for various activities.

212. During Kim K. Cheung's employment with the New York Falun Dafa Association Corp and the Falun Dafa religion, Kim K. Cheung forced Ms. Chen, via threats of physical and sexual violence, to attend and participate in multiple political protests as well as religious festivals hosted by and for the benefit of the New York Falun Dafa Association Corp and the Falun Dafa religion from May of 2016 until January of 2018.

213. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photograph at said protest. The photographs from this protest were uploaded to the internet.

214. Kim K. Cheung's conduct in forcing Ms. Chen to attend and participate in said protests and festivals was for the benefit of the New York Falun Dafa Association Corp and the Falun Dafa religion.

215. The New York Falun Dafa Association Corp and the Falun Dafa religion knowingly and/or recklessly benefited from the venture of Ms. Chen's enslavement and forced attendance in that she was represented to the public as a supporter and follower of the same, bolstering the New York Falun Dafa Association Corp and the Falun Dafa religion's public appearance and reputation as being a legitimate religion.

216. Due to Ms. Chen's involvement with the New York Falun Dafa Association Corp and the Falun Dafa religion, Ms. Chen will not be able to return to China as these activities are considered treasonous by the Chinese Government.

217. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

218. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

219. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees

**Seventeenth Cause of Action – Private Right of Action pursuant to 18 U.S.C. § 1595**

**For Peonage pursuant to 18 U.S.C. § 1581**

**& Forced Labor pursuant to 18 U.S.C. § 1589(b) against the**

**Defendant NY Metropolitan Falun Dafa Association, Inc.**

220. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

221. Between May of 2016 and January of 2018, the NY Metropolitan Falun Dafa Association, Inc. and the Falun Dafa religion employed Kim K. Cheung as an organizer for various activities.

222. Based upon information and belief, the NY Metropolitan Falun Dafa Association, Inc. and the Falun Dafa religion still employ Kim K. Cheung as an organizer for various activities.

223. During Kim K. Cheung's employment with the NY Metropolitan Falun Dafa Association, Inc. and the Falun Dafa religion, Kim K. Cheung forced Ms. Chen, via threats of physical and sexual violence, to attend and participate in multiple political protests as well as religious festivals hosted by and for the benefit of the NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion from May of 2016 until January of 2018.

224. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photograph at said protest. The photographs from this protest were uploaded to the internet.

225. Kim K. Cheung's conduct in forcing Ms. Chen to attend and participate in said protests and festivals was for the benefit of the NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion.

226. The NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion knowingly and/or recklessly benefited from the venture of Ms. Chen's enslavement and forced attendance in that she was represented to the public as a supporter and follower of the same, bolstering the NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion's public appearance and reputation as being a legitimate religion.

227. Due to Ms. Chen's involvement with the NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion, Ms. Chen will not be able to return to China as these activities are considered treasonous by the Chinese Government.

228. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

229. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

230. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Eighteenth Cause of Action – Private Right of Action pursuant to  
Common Law Negligent Hiring, Supervision, Oversight, & Retention against the  
Defendant the Eastern US Buddha's Study (Falun Dafa) Association, Inc.**

231. Plaintiff repeats each and every allegation from the first paragraph as if the same were set forth herein at length.

232. At all times mentioned herein, Kim K. Cheung was employed by the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion as an organizer and coordinator, and was an employee, independent contractor, subcontractor, agent, and/or partner to provide services in furtherance of the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion's religious, political and commercial activities and interests in the State of New York.

233. In particular, while acting as an organizer and coordinator for the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion, and within the scope of his employ as the same, Kim K. Cheung, on multiple occasions, forced Ms.

Chen to participate in protests, parades, festivals and other activities for the religious, political and commercial benefit of the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion.

234. Kim K. Cheung utilized the threat of violence against Ms. Chen and her family back in China in order to coerce Ms. Chen to participate the said protests, parades, festivals and other activities from May of 2016 until January of 2018.

235. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photograph at said protest. The photographs from this protest were uploaded to the internet.

236. The Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion knew of Kim K. Cheung and the people he "organized" to participate in the protests, parades, festivals and other activities, including Ms. Chen.

237. Irrespective of the knowledge of the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion, the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion were reckless, negligent, and careless in their hiring, supervision, oversight and retention of Kim K. Cheung.

238. The Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion had a duty to examine Kim K. Cheung's background before hiring him and had a duty to supervise and oversee his activities as an organizer and coordinator.

239. The Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion behaved in an unreasonable manner by failing to provide any supervision and oversight over Kim K. Cheung's activities as described.

240. As a direct and proximate result of the Eastern US Buddha's Study (Falun Dafa) Association, Inc.'s and Falun Dafa religion's failure to supervise and oversee Kim K. Cheung's activities, Ms. Chen was injured by being subjected to threats of violence and was coerced into participating in religious, political and commercial activities for the benefit of the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion.

241. Ms. Chen was also injured by being forced to engage in activities, as mentioned above, that are considered treasonous by the Chinese government and cannot return home without facing legal punishment by the same.

242. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

243. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

244. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Nineteenth Cause of Action – Private Right of Action pursuant to  
Common Law Negligent Hiring, Supervision, Oversight, & Retention against the  
Defendant the Friends of Falun Gong, Inc.**

245. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

246. At all times mentioned herein, Kim K. Cheung was employed by the Friends of Falun Gong, Inc., and the Falun Dafa religion as an organizer and coordinator, and was an employee, independent contractor, subcontractor, agent, and/or partner to provide

services in furtherance of the Friends of Falun Gong, Inc., and the Falun Dafa religion's religious, political and commercial activities and interests in the State of New York.

247. In particular, while acting as an organizer and coordinator for the Friends of Falun Gong, Inc., and the Falun Dafa religion, and within the scope of his employ as the same, Kim K. Cheung, on multiple occasions, forced Ms. Chen to participate in protests, parades, festivals and other activities for the religious, political and commercial benefit of the Friends of Falun Gong, Inc., and the Falun Dafa religion.

248. Kim K. Cheung utilized the threat of violence against Ms. Chen and her family back in China in order to coerce Ms. Chen to participate the said protests, parades, festivals and other activities from May of 2016 until January of 2018.

249. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photograph at said protest. The photographs from this protest were uploaded to the internet.

250. The Friends of Falun Gong, Inc., and the Falun Dafa religion knew of Kim K. Cheung and the people he "organized" to participate in the protests, parades, festivals and other activities, including Ms. Chen.

251. Irrespective of the knowledge of the Friends of Falun Gong, Inc., and the Falun Dafa religion, the Friends of Falun Gong, Inc., and the Falun Dafa religion were reckless, negligent, and careless in their hiring, supervision, oversight and retention of Kim K. Cheung.

252. The Friends of Falun Gong, Inc., and the Falun Dafa religion had a duty to examine Kim K. Cheung's background before hiring him and had a duty to supervise and oversee his activities as an organizer and coordinator.

253. The Friends of Falun Gong, Inc., and the Falun Dafa religion behaved in an unreasonable manner by failing to provide any supervision and oversight over Kim K. Cheung's activities as described.

254. As a direct and proximate result of the Friends of Falun Gong, Inc.'s and Falun Dafa religion's failure to supervise and oversee Kim K. Cheung's activities, Ms. Chen was injured by being subjected to threats of violence and was coerced into participating in religious, political and commercial activities for the benefit of the Friends of Falun Gong, Inc., and the Falun Dafa religion.

255. Ms. Chen was also injured by being forced to engage in activities, as mentioned above, that are considered treasonous by the Chinese government and cannot return home without facing legal punishment by the same.

256. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

257. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

258. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Twentieth Cause of Action – Private Right of Action pursuant to  
Common Law Negligent Hiring, Supervision, Oversight, & Retention  
against the Defendant the International Falun Dafa Association, Inc.**

259. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

260. At all times mentioned herein, Kim K. Cheung was employed by the International Falun Dafa Association, Inc., and the Falun Dafa religion as an organizer and coordinator, and was an employee, independent contractor, subcontractor, agent, and/or partner to provide services in furtherance of the International Falun Dafa Association, Inc., and the Falun Dafa religion' religious, political and commercial activities and interests in the State of New York

261. In particular, while acting as an organizer and coordinator for the International Falun Dafa Association, Inc., and the Falun Dafa religion, and within the scope of his employ as the same, Kim K. Cheung, on multiple occasions, forced Ms. Chen to participate in protests, parades, festivals and other activities for the religious, political and commercial benefit of the International Falun Dafa Association, Inc., and the Falun Dafa religion.

262. Kim K. Cheung utilized the threat of violence against Ms. Chen and her family back in China in order to coerce Ms. Chen to participate the said protests, parades, festivals and other activities from May of 2016 until January of 2018.

263. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photograph at said protest. The photographs from this protest were uploaded to the internet.

264. The International Falun Dafa Association, Inc., the Falun Dafa religion knew of Kim K. Cheung and the people he "organized" to participate in the protests, parades, festivals and other activities, including Ms. Chen.

265. Irrespective of the knowledge of the International Falun Dafa Association, Inc., and the Falun Dafa religion, the International Falun Dafa Association, Inc., and Falun

Dafa religion were reckless, negligent, and careless in their hiring, supervision, oversight and retention of Kim K. Cheung.

266. The International Falun Dafa Association, Inc., and the Falun Dafa religion had a duty to examine Kim K. Cheung's background before hiring him and had a duty to supervise and oversee his activities as an organizer and coordinator.

267. The International Falun Dafa Association, Inc., and the Falun Dafa religion behaved in an unreasonable manner by failing to provide any supervision and oversight over Kim K. Cheung's activities as described.

268. As a direct and proximate result of the International Falun Dafa Association, Inc.'s and Falun Dafa religion's failure to supervise and oversee Kim K. Cheung's activities, Ms. Chen was injured by being subjected to threats of violence and was coerced into participating in religious, political and commercial activities for the benefit of the International Falun Dafa Association, Inc., and the Falun Dafa religion.

269. Ms. Chen was also injured by being forced to engage in activities, as mentioned above, that are considered treasonous by the Chinese government and cannot return home without facing legal punishment by the same.

270. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

271. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

272. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Twenty-First Cause of Action – Private Right of Action pursuant to**

**Common Law Negligent Hiring, Supervision, Oversight, & Retention  
against the Defendant the New York Falun Dafa Association Corp**

273. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

274. At all times mentioned herein, Kim K. Cheung was employed by the New York Falun Dafa Association Corp and the Falun Dafa religion as an organizer and coordinator, and was an employee, independent contractor, subcontractor, agent, and/or partner to provide services in furtherance of the New York Falun Dafa Association Corp and the Falun Dafa religion's religious, political and commercial activities and interests in the State of New York

275. In particular, while acting as an organizer and coordinator for the New York Falun Dafa Association Corp and the Falun Dafa religion, and within the scope of his employ as the same, Kim K. Cheung, on multiple occasions, forced Ms. Chen to participate in protests, parades, festivals and other activities for the religious, political and commercial benefit of the New York Falun Dafa Association Corp and the Falun Dafa religion.

276. Kim K. Cheung utilized the threat of violence against Ms. Chen and her family back in China in order to coerce Ms. Chen to participate the said protests, parades, festivals and other activities from May of 2016 until January of 2018.

277. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photograph at said protest. The photographs from this protest were uploaded to the internet.

278. The New York Falun Dafa Association Corp and the Falun Dafa religion knew of Kim K. Cheung and the people he “organized” to participate in the protests, parades, festivals and other activities, including Ms. Chen.

279. Irrespective of the knowledge of the New York Falun Dafa Association Corp and the Falun Dafa religion, the New York Falun Dafa Association Corp and the Falun Dafa religion were reckless, negligent, and careless in their hiring, supervision, oversight and retention of Kim K. Cheung.

280. The New York Falun Dafa Association Corp and the Falun Dafa religion had a duty to examine Kim K. Cheung’s background before hiring him and had a duty to supervise and oversee his activities as an organizer and coordinator.

281. The New York Falun Dafa Association Corp and the Falun Dafa religion behaved in an unreasonable manner by failing to provide any supervision and oversight over Kim K. Cheung’s activities as described.

282. As a direct and proximate result of the New York Falun Dafa Association Corp’s and Falun Dafa’s failure to supervise and oversee Kim K. Cheung’s activities, Ms. Chen was injured by being subjected to threats of violence and was coerced into participating in religious, political and commercial activities for the benefit of the New York Falun Dafa Association Corp and the Falun Dafa religion.

283. Ms. Chen was also injured by being forced to engage in activities, as mentioned above, that are considered treasonous by the Chinese government and cannot return home without facing legal punishment by the same.

284. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

285. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

286. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Twenty-Second Cause of Action – Private Right of Action pursuant to  
Common Law Negligent Hiring, Supervision, Oversight, & Retention  
against the Defendant the NY Metropolitan Falun Dafa Association, Inc.**

287. Plaintiff repeats each and every allegation from the first paragraph as if the same were set forth herein at length.

288. At all times mentioned herein, Kim K. Cheung was employed by the NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion as an organizer and coordinator, and was an employee, independent contractor, subcontractor, agent, and/or partner to provide services in furtherance of the NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion's religious, political and commercial activities and interests in the State of New York

289. In particular, while acting as an organizer and coordinator for the NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion, and within the scope of his employ as the same, Kim K. Cheung, on multiple occasions, forced Ms. Chen to participate in protests, parades, festivals and other activities for the religious, political and commercial benefit of the NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion.

290. Kim K. Cheung utilized the threat of violence against Ms. Chen and her family back in China in order to coerce Ms. Chen to participate the said protests, parades, festivals and other activities from May of 2016 until January of 2018.

291. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photograph at said protest. The photographs from this protest were uploaded to the internet.

292. The NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion knew of Kim K. Cheung and the people he “organized” to participate in the protests, parades, festivals and other activities, including Ms. Chen.

293. Irrespective of the knowledge of the NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion, the NY Metropolitan Falun Dafa Association, Inc., and Falun Dafa religion were reckless, negligent, and careless in their hiring, supervision, oversight and retention of Kim K. Cheung.

294. The NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion had a duty to examine Kim K. Cheung’s background before hiring him and had a duty to supervise and oversee his activities as an organizer and coordinator.

295. The NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion behaved in an unreasonable manner by failing to provide any supervision and oversight over Kim K. Cheung’s activities as described.

296. As a direct and proximate result of the NY Metropolitan Falun Dafa Association, Inc.’s and Falun Dafa’s failure to supervise and oversee Kim K. Cheung’s activities, Ms. Chen was injured by being subjected to threats of violence and was coerced into

participating in religious, political and commercial activities for the benefit of the NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion.

297. Ms. Chen was also injured by being forced to engage in activities, as mentioned above, that are considered treasonous by the Chinese government and cannot return home without facing legal punishment by the same.

298. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

299. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

300. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Twenty-Third Cause of Action – Private Right of Action pursuant to  
Common Law Negligent Security against the  
Defendant The Eastern US Buddha's Study (Falun Dafa) Association, Inc.**

301. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

302. At all times mentioned herein, the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion had a common law duty to provide security for the participants of their protests, parades and religious festivals.

303. Ms. Chen, as a victim of human trafficking and slavery, was forced to participate in multiple protests, parades and festivals organized by and for the benefit of the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion from May of 2016 until January of 2018.

304. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photograph at said protest. The photographs from this protest were uploaded to the internet.

305. The Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion failed to provide any security or oversight of their protests, parades, festivals and all other organized outdoors activities.

306. As a result of the Eastern US Buddha's Study (Falun Dafa) Association, Inc.'s and the Falun Dafa religion's failure to provide a reasonable amount of security and oversight of their protests, parades, festivals and other activities, Ms. Chen was injured at each and every protest, parade, and festival she attended for the benefit of the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion.

307. As a direct and proximate result of the Eastern US Buddha's Study (Falun Dafa) Association, Inc.'s and Falun Dafa religion's failure to provide reasonable security and oversight for their protests, parades and festivals, Ms. Chen was injured by being subjected to threats of violence and was coerced into participating in religious, political and commercial activities for the benefit of the Eastern US Buddha's Study (Falun Dafa) Association, Inc., and the Falun Dafa religion.

308. Ms. Chen was also injured by being forced to engage in activities, as mentioned above, that are considered treasonous by the Chinese government and cannot return home without facing legal punishment by the same.

309. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

310. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

311. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Twenty-Fourth Cause of Action – Private Right of Action pursuant to  
Common Law Negligent Security against the  
Defendant The Friends of Falun Gong, Inc.**

312. Plaintiff repeats each and every allegation from the first paragraph as if the same were set forth herein at length.

313. At all times mentioned herein, the Friends of Falun Gong, Inc., and the Falun Dafa religion had a common law duty to provide security for the participants of their protests, parades and religious festivals.

314. Ms. Chen, as a victim of human trafficking and slavery, was forced to participate in multiple protests, parades and festivals organized by and for the benefit of the Friends of Falun Gong, Inc., and the Falun Dafa religion from May of 2016 until January of 2018.

315. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photographed at said protest. The photographs from this protest were uploaded to the internet.

316. The Friends of Falun Gong, Inc., and the Falun Dafa religion failed to provide any security or oversight of their protests, parades, festivals and all other organized outdoors activities.

317. As a result of the Friends of Falun Gong, Inc.'s and the Falun Dafa religion's failure to provide a reasonable amount of security and oversight of their protests, parades,

festivals and other activities, Ms. Chen was injured at each and every protest, parade, and festival she attended for the benefit of the Friends of Falun Gong, Inc., and the Falun Dafa religion.

318. As a direct and proximate result of the Friends of Falun Gong, Inc.'s and Falun Dafa religion's failure to provide reasonable security and oversight for their protests, parades and festivals, Ms. Chen was injured by being subjected to threats of violence and was coerced into participating in religious, political and commercial activities for the benefit of the Friends of Falun Gong, Inc., and the Falun Dafa religion.

319. Ms. Chen was also injured by being forced to engage in activities, as mentioned above, that are considered treasonous by the Chinese government and cannot return home without facing legal punishment by the same.

320. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

321. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

322. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Twenty-Fifth Cause of Action – Private Right of Action pursuant to  
Common Law Negligent Security against the  
Defendant International Falun Dafa Association, Inc.**

323. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

324. At all times mentioned herein, the the International Falun Dafa Association, Inc., and the Falun Dafa religion had a common law duty to provide security for the participants of their protests, parades and religious festivals.

325. Ms. Chen, as a victim of human trafficking and slavery, was forced to participate in multiple protests, parades and festivals organized by and for the benefit of the International Falun Dafa Association, Inc., and the Falun Dafa religion from May of 2016 until January of 2018.

326. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photograph at said protest. The photographs from this protest were uploaded to the internet.

327. The International Falun Dafa Association, Inc., and the Falun Dafa religion failed to provide any security or oversight of their protests, parades, festivals and all other organized outdoors activities.

328. As a result of the International Falun Dafa Association, Inc.'s and the Falun Dafa religion's failure to provide a reasonable amount of security and oversight of their protests, parades, festivals and other activities, Ms. Chen was injured at each and every protest, parade, and festival she attended for the benefit of the International Falun Dafa Association, Inc., and the Falun Dafa religion.

329. As a direct and proximate result of the International Falun Dafa Association, Inc.'s and Falun Dafa religion's failure to provide reasonable security and oversight for their protests, parades and festivals, Ms. Chen was injured by being subjected to threats of violence and was coerced into participating in religious, political and commercial

activities for the benefit of the International Falun Dafa Association, Inc., and the Falun Dafa religion.

330. Ms. Chen was also injured by being forced to engage in activities, as mentioned above, that are considered treasonous by the Chinese government and cannot return home without facing legal punishment by the same.

331. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

332. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

333. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Twenty-Sixth Cause of Action – Private Right of Action pursuant to  
Common Law Negligent Security against the  
Defendant New York Falun Dafa Association Corp**

334. Plaintiff repeats each and every allegation from the first paragraph as if the same were set for herein at length.

335. At all times mentioned herein, the New York Falun Dafa Association Corp and the Falun Dafa religion had a common law duty to provide security for the participants of their protests, parades and religious festivals.

336. Ms. Chen, as a victim of human trafficking and slavery, was forced to participate in multiple protests, parades and festivals organized by and for the benefit of the New York Falun Dafa Association Corp and the Falun Dafa religion from May of 2016 until January of 2018.

337. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photograph at said protest. The photographs from this protest were uploaded to the internet.

338. The New York Falun Dafa Association Corp and the Falun Dafa religion failed to provide any security or oversight of their protests, parades, festivals and all other organized outdoors activities.

339. As a result of the New York Falun Dafa Association Corp's and the Falun Dafa religion's failure to provide a reasonable amount of security and oversight of their protests, parades, festivals and other activities, Ms. Chen was injured at each and every protest, parade, and festival she attended for the benefit of the New York Falun Dafa Association Corp and the Falun Dafa religion.

340. As a direct and proximate result of the New York Falun Dafa Association Corp's and Falun Dafa religion's failure to provide reasonable security and oversight for their protests, parades and festivals, Ms. Chen was injured by being subjected to threats of violence and was coerced into participating in religious, political and commercial activities for the benefit of the New York Falun Dafa Association Corp and the Falun Dafa religion.

341. Ms. Chen was also injured by being forced to engage in activities, as mentioned above, that are considered treasonous by the Chinese government and cannot return home without facing legal punishment by the same.

342. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

343. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

344. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Twenty-Seventh Cause of Action – Private Right of Action pursuant to  
Common Law Negligent Security against the  
Defendant NY Metropolitan Falun Dafa Association, Inc.**

345. Plaintiff repeats each and every allegation from the first paragraph as if the same were set forth herein at length.

346. At all times mentioned herein, the NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion had a common law duty to provide security for the participants of their protests, parades and religious festivals.

347. Ms. Chen, as a victim of human trafficking and slavery, was forced to participate in multiple protests, parades and festivals organized by and for the benefit of the NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion from May of 2016 until January of 2018.

348. In particular, Ms. Chen was forced to attend a political protest in September of 2016 and was photographed at said protest. The photographs from this protest were uploaded to the internet.

349. The NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion failed to provide any security or oversight of their protests, parades, festivals and all other organized outdoors activities.

350. As a result of the NY Metropolitan Falun Dafa Association, Inc.'s and the Falun Dafa religion's failure to provide a reasonable amount of security and oversight of their protests, parades, festivals and other activities, Ms. Chen was injured at each and every protest, parade, and festival she attended for the benefit of the NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion.

351. As a direct and proximate result of the NY Metropolitan Falun Dafa Association, Inc.'s and Falun Dafa religion's failure to provide reasonable security and oversight for their protests, parades and festivals, Ms. Chen was injured by being subjected to threats of violence and was coerced into participating in religious, political and commercial activities for the benefit of the NY Metropolitan Falun Dafa Association, Inc., and the Falun Dafa religion.

352. Ms. Chen was also injured by being forced to engage in activities, as mentioned above, that are considered treasonous by the Chinese government and cannot return home without facing legal punishment by the same.

353. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

354. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

355. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

**Twenty-Eighth Cause of Action – Private Right of Action pursuant to  
Common Law Negligent Security against Defendant Yong Zhao Cai**

356. Plaintiff repeats each and every allegation from the first paragraph as if the same here set forth herein at length.

357. Yong Zhao Cai was at all times the events taking place as described in all the above paragraphs, the owner and possessor of a property located at 189 Guymard Turnpike, Middletown, New York 10940.

358. Based upon current information and belief, the property located at 189 Guymard Turnpike, Middletown, New York 10940 served as Yong Zhao Cai's residence and home here in the United States.

359. Ms. Chen resided at Yong Zhao Cai's above property from May 27, 2016 until January of 2018.

360. As owner of the property, Yong Zhao Cai, pursuant to common law, had a duty to take reasonable measures to maintain the property in a safe condition.

361. New York common law has clarified that the above duty includes taking minimal precautions to protect tenants and other persons on its premises from foreseeable harm, including a third party's foreseeable criminal conduct.

362. Yong Zhao Cai failed to provide security to the property.

363. Yong Zhao Cai's failure was clear and unreasonable as a continuous criminal enterprise of slavery and human trafficking was taking place and being run by all named defendants.

364. Ms. Chen was the victim of said slavery and human trafficking from May 27, 2016 until January of 2018 as a result.

365. Yong Zhao Cai's failure to provide reasonable security is also noteworthy on certain dates and Ms. Chen was injured as a direct result.

366. In November of 2016, Ms. Chen was physically and sexually attacked by Kim K. Cheung at Yong Chao Cai's home.

367. Yong Zhao Cai was familiar with Kim K. Cheung's violent tendencies, and yet allowed him on the property regularly.

368. Allowing Kim K. Cheung on the property was unreasonable and constituted a breach of Yong Zhao Cai's duty to provide security.

369. Furthermore, on November 1, 2016, Jiang Li physically battered and assaulted Ms. Chen.

370. Yong Zhao Cai was familiar with Jiang Li's violent tendencies, and yet allowed him on the property regularly.

371. Allow Jiang Li on the property was unreasonable and constituted a breach of Yong Zhao Cai's duty to provide security.

372. As a direct and proximate result of Yong Zhao Cai's multiple failures to provide reasonable security and oversight for his property, Ms. Chen was injured by being violently raped and physically assaulted.

373. Ms. Chen was severely injured bodily, emotionally, and psychologically as a direct result of the foregoing.

374. Ms. Chen's injuries are permanent in character, and Ms. Chen will continue to suffer pain, distress and anguish for the balance of her natural life.

375. Therefore, Ms. Chen seeks compensatory and punitive damages as well as reasonable attorney's fees.

### **Injuries & Damages**

376. Plaintiff repeats each and every allegation from the first paragraph as if the same were set forth herein at length.

377. As a result of the foregoing, Ms. Chen was seriously and permanently injured.

378. Specifically, Ms. Chen suffered violent rape and sexual violence, physical beatings, choking, and was forced to engage in manual labor.

379. All of the injuries described in all throughout this complaint occurred on a continuous basis from May 27, 2016 until January of 2018.

380. Ms. Chen was also forced to engage in activities considered treasonous by her home country, specifically; participating in multiple Falun Gong or Falun Dafa political, religious and commercial activities and filing an asylum application to extend her stay in the United States.

381. Ms. Chen is now considered a traitor by her home country, The People's Republic of China.

382. In addition to physical trauma, Ms. Chen has suffered enormous emotional and psychological pain, suffering, anguish and damages as a result of all the above.

### **Prayer for Relief**

WHEREFORE, Plaintiff, Ms. Chen, demands judgment against all named defendants, for:

- (a) General and compensatory damages in an amount which shall be shown to be reasonable and just by the evidence;**
- (b) Punitive damages;**
- (c) Attorney's fees pursuant to 18 U.S.C. § 1595(a);**

- (d) **Additional Restitution pursuant to 18 U.S.C. § 1593;**
- (e) **Interest;**
- (f) **Costs of suit;**
- (g) **An order of protection in favor of Plaintiff and all associated with her to be issued as to protect her and them from harm and harassment from Defendants and their agents and associates;**
- (h) **An order making a finding of the following facts; (1) Ms. Chen was a victim of human trafficking and slavery, (2) Ms. Chen was coerced to participate in Falun Gong or Falun Dafa activities and thus did not do so on her own free will and volition, and (3) Ms. Chen was coerced into drafting and executing a false affidavit and asylum visa application and thus did not do so on her own free will and volition; and**
- (i) **Such other and further relief as the court deems just.**

Dated: June 7, 2019

Respectfully submitted,  
Mount Law Group, PLLC

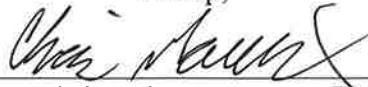
  
By: Christopher R. Mount, Esq.  
SDNY Bar Code: CM1337  
Mount Law Group, PLLC  
400 Rella Boulevard, Suite 165  
Suffern, New York 10901  
*Attorneys for the Plaintiff*

**JURY DEMAND**

Plaintiff demands trial by jury as to all issues so triable.

Dated: June 7, 2019

Respectfully submitted,  
Mount Law Group, PLLC



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By: Christopher R. Mount, Esq.  
SDNY Bar Code: CM1337  
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400 Rella Boulevard, Suite 165  
Suffern, New York 10901  
*Attorneys for the Plaintiff*